

FILED

SEP 12 2019

CLERK U.S. BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
BY: *W* Deputy Clerk

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION**

In re) BK No. 2:16-bk-16833-SK & 2:18-bk-
Eduardo Enrique Vallejo & Beisa Ramulic) 16497-SK
Vallejo,) Chapter 13
Debtors,) **DECLARATION BY DEBTOR EDUARDO
vs.) VALLEJO REGARDING ARBITRATION
WHEELS FINANCIAL GROUP, LLC.,) IN SUPPORT OF OPPOSITION TO
et al.) MOTION FOR RELIEF FROM
AUTOMATIC STAY FILED BY
CREDITOR AND REQUEST FOR AN
URGENT ORDER TO RETURN THE
PRIVATE PROPERTY TO DEBTOR**

**TO THE HONORABLE DISTRICT COURT, THE TRUSTEE AND OTHER
INTERESTED PARTIES**

PLEASE TAKE NOTICE that on August 30, 2019 Debtor, Eduardo Vallejo, filed a notice and a motion to reopen this bankruptcy case, and now asks the Court to Stay the matter until after Arbitration has been finalized based on the following:

DECLARATION

My name is Eduardo Vallejo, I am 61 years of age, the husband of the Debtor, Beisa Ramulic Vallejo, and declare as follows:

1.) My wife and I live in a community property State and together we own the personal property pertaining to our Estate, the vehicle a 1974 Alfa Romeo Spider with VIN: AR3043863, with active California License Number 4USG591, insured since June 9, 2016 with GEICO Policy

Case numbers: 2:16-bk-16833-SK & 2:18-bk-16497-SK

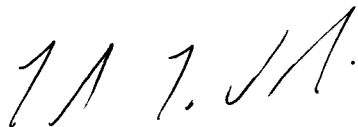
1 Number: 4438321418, which has in our opinion been repossessed unlawfully and in violation of the
2 automatic stay. (See Doc 144 Filed 08/30/19)

3 2.) I have personal knowledge of the status, contracts, and history regarding the above
4 referenced vehicle, and if called upon to testify thereto I could and would do so competently and
5 truthfully.
6

7 3.) On or about September 8, 2019, pursuant to the terms of the contract with the
8 Creditor, we filed for Arbitration in Case: 011900028313 with the American Arbitration
9 Association, New York, NY 10271, US (Email: corpfinance@adr.org) and sent a copy to
10 the Creditor.
11

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct.

14 Executed this 10th day of September 2019, at Burbank, California.
15

16
17 
18

19 EDUARDO VALLEJO
20 508 NORTH CALIFORNIA STREET
21 BURBANK, CA 91505
22 TEL: 1 (818) 415-5633
23 FAX: 1 (818) 846-1777
24 EMAIL: eevallejo@yahoo.com
25
26
27
28

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CERTIFICATE OF SERVICE

Federal Bankruptcy Court Case Numbers: 2:16-bk-16833-SK & 2:18-bk-16497-SK

I am a resident of the State of California, over the age of eighteen years, and a party to the within action.

DECLARATION BY DEBTOR EDUARDO VALLEJO REGARDING ARBITRATION IN SUPPORT OF OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY FILED BY CREDITOR AND REQUEST FOR AN URGENT ORDER TO RETURN THE PRIVATE PROPERTY TO DEBTOR

☐ by transmitting via facsimile on this date the document(s) listed above to the facsimile numbers set forth below. The transmission was completed before the close of business and was reported complete and without error.

☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail addressed as set forth below. I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date on postage meter date is more than one day after the date of deposit in this Declaration.

☒ BY CM/ECF ELECTRONIC DELIVERY: In accordance with the registered case participants and in accordance with the procedures set forth at the Federal Bankruptcy and District Courts, Ninth Circuit BAP and Court of Appeals of California website <https://ecf.cacd.uscourts.gov>.

☒ by placing the document(s) listed above in a sealed envelope(s) and consigning it to an express mail service for guaranteed delivery on the next business day following the date of consignment to the address(es) set forth below. A copy of the consignment slip is attached to this proof of service. (See Attached Service List)

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Respectfully submitted, this 10th day of September of 2019.

Dated: September 10, 2019

/s/ Eduardo Enrique Vallejo

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